



REC'D TN
REGULATORY AUTH.

BellSouth Telecommunications, Inc.
Suite 2101
333 Commerce Street
Nashville, Tennessee 37201-3300

615 214-6301
Fax 615 214-7406

Guy M. Hicks
General Counsel

'98 FEB 24 PM 12 39
February 24, 1998

OFFICE OF THE
EXECUTIVE SECRETARY

VIA HAND DELIVERY

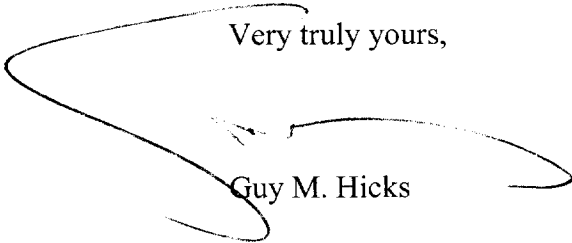
David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *BellSouth Telecommunications, Inc.'s Entry Into Long Distance
(InterLATA) Service in Tennessee Pursuant to Section 271 of the
Telecommunications Act of 1996*
Docket No. 97-00309

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of the responses of BellSouth Telecommunications, Inc. to the Data Requests of NEXTLINK. A copy has been provided to counsel of record.

Very truly yours,



Guy M. Hicks

GMH:ch

Enclosure

BellSouth Telecommunications, Inc.
TRA Docket No. 97-00309
NEXTLINK's First Data Request
February 10, 1998
Item No. 1
Page 1 of 1

REQUEST: Please produce all documents, including all internal analyses and all correspondence, internal memoranda, telephone records, electronic mail, facsimiles, and other records of communications between BellSouth and NEXTLINK or within BellSouth that refer to outages on NEXTLINK's network.

Please produce all documents, including all internal analyses and all correspondence, internal memoranda, telephone records, electronic mail, facsimiles, and other records of communications between BellSouth and NEXTLINK or within BellSouth that refer to blockage of calls to or from NEXTLINK customers.

RESPONSE: The attached are communications between BellSouth and NEXTLINK which refer to blockage and outages on the NEXTLINK network.



BellSouth Telecommunications, Inc.
Room 22A1
333 Commerce Street
Nashville, Tennessee 37201-3300

Regulatory

BellSouth Telecommunications, Inc.
TN Docket 97-00309
NextLink's 1st Document Requests
Item 1
Attachment

March 3, 1997

Ms. Dana R. Schaffer
Director - Regulatory and Governmental Affairs
NEXTLINK
105 Molloy Street, Suite 300
Nashville, TN 37201

Dear Ms. Schaffer:

I have completed an investigation into the network blockages experienced by NEXTLINK customers on February 28, 1997. Apparently a blocking condition resulted when a technician keyed in an incorrect number while working to resolve another, unrelated, problem. BellSouth corrected the problem and restored the network to proper operation by 4:30 p.m. Calls from NEXTLINK customers into BellSouth's network were not affected during this time.

BellSouth strives to consistently provide high quality interconnection services to NEXTLINK, and we very much regret this situation and the inconvenience experienced by NEXTLINK's customers.

Sincerely,

A handwritten signature in cursive script that reads "Paul Stinson".

Paul T. Stinson



March 5, 1997

Via facsimile: 615-214-8867
(Original via Certified Mail)

Paul Stinson
BellSouth Telecommunications
333 Commerce Street
Room 22K103
Nashville, Tennessee 37201

Dear Paul:

I am disappointed in your documentation of the service outage caused by BellSouth last Friday, February 28, 1997. In your letter, you simply explain Friday's problem as resulting "when a technician keyed in an incorrect number while working to resolve another, unrelated, problem." NEXTLINK believes this is an inadequate explanation of the problem.

In characterizing the problem only as "a blocking condition" and stating that "[c]alls from NEXTLINK customers into BellSouth's network were not affected" during the time of this "blocking condition," your letter implies that this problem was not substantial. On the contrary: the BellSouth employee actions that occurred on Friday afternoon, February 28, 1997, in Nashville, Tennessee, brought traffic down to an entire NEXTLINK NXX across the LATA. During the time period of approximately 3:00 p.m. to 4:30 p.m., it was not possible for BellSouth customers (or the customers of any other local provider, such as cellular providers, interconnecting via BellSouth's network) to complete calls to NEXTLINK customers. The problem also prevented NEXTLINK long distance customers using BellSouth for local service from having their long distance calls completed.

Based upon our preliminary analysis, we believe this problem was caused by changes to two (2) or more tables in the BellSouth Main LATA tandem switch, most likely HNPA Control tables. On Thursday, February 27, we noted that BellSouth was attempting to route many improper numbers to the NEXTLINK switch. A trouble ticket was opened by NEXTLINK to BellSouth on Thursday, requesting that the improper numbers not be sent to NEXTLINK. Perhaps the Friday problem was caused when BellSouth was trying to correct the prior mistake. In any event, NEXTLINK deserves a full and detailed analysis of this problem, plus an understanding of procedures that are to be implemented to prevent similar problems in the future.

105 Molloy Street
Suite 300
Nashville, TN 37201

615.777.7777

fax: 615.777.7709



Paul Stinson
BellSouth Telecommunications
March 6, 1997
Page 2

As you are well aware, this is not the first time Bell actions have caused a substantial adverse impact on our network. Other examples include busy trunks, a problem which BellSouth initially denied and finally corrected after having a trouble ticket open for eight days. Another occurrence of improper actions concerned virtual collocation and the issue of technical support. BellSouth refused to maintain the equipment in the virtual collocate space, contrary to tariff provisions, a refusal which resulted in service problems for NEXTLINK customers.

Paul, you stated to me on Friday that this latest problem was "inadvertently" caused by BellSouth. Nonetheless, because these problems seem to continue, we have serious doubts as to whether BellSouth is giving NEXTLINK the same quality of service as BellSouth provides to its own customers. More importantly, we are concerned by BellSouth's unwillingness to deal with us in a forthright manner when attempting to resolve and prevent these problems from occurring in the future.

Please provide complete, detailed documentation of this problem and contact me at your earliest convenience to discuss BellSouth's plans for preventing such problems in the future.

Sincerely,

Dana R. Shaffer

CC: Guy Hicks
Charlie Howorth

BellSouth Telecommunications, Inc.
Room 22A1
333 Commerce Street
Nashville, Tennessee 37201-3300

Regulatory

March 21, 1997

Dana B. Shaffer
Director - Regulatory and Governmental Affairs
NEXTLINK
105 Molloy Street, Suite 300
Nashville, TN 37201

Dear Dana:

I received your letter dated March 5, 1997 expressing your disappointment with the information which I provided on March 3, 1997. The purpose of my letter was to provide a brief, prompt explanation of the blocking condition which occurred on February 28, 1997, not provide a full and detailed analysis of this occurrence.

The cause of the problem was accurately attributed to human error, as described in my letter. While BellSouth continually reviews and revises internal operating procedures to improve performance, the simple fact is that human error can never be completely eliminated as long as people provision, maintain and repair the network. This fact in no way excuses the error that caused the blocking condition, but simply states reality. Any company would be less than truthful to state that a process which involves human interaction can be made 100% error free.

As my letter noted, actions by a BellSouth technician caused the problem on February 28, 1997, and BellSouth corrected the problem when it was discovered. This is the procedure that BellSouth would follow for any customer. BellSouth does not agree that the other examples of BellSouth actions referenced in your letter caused "substantial adverse impact on [y]our network." BellSouth denies any improper actions surrounding collocation or technical support issues. Finally, BellSouth also denies any unwillingness to deal with NEXTLINK, or any other customer, in a forthright manner regarding any problem resolution activities.

March 21, 1997

Page 2

Dana, I am concerned that NEXTLINK has taken an approach with BellSouth that alleges improper actions and an unwillingness to deal forthrightly. We are also disappointed that private candid conversations with NEXTLINK were subsequently discussed publicly in a very one-sided manner during the Tennessee Regulatory Authority's Conference on March 4, 1997.

Nevertheless, my objective is unchanged, and that is to work cooperatively with NEXTLINK to promptly resolve any problems or outstanding issues which you may have with BellSouth. I hope you will agree that we can accomplish this goal much more efficiently by using a cooperative approach as demonstrated by our joint tour of several Nashville central offices on March 11, 1997.

Please contact me if there are any specific issues which you would like to discuss.

Paul Stinson

NEXTLINK

January 17, 1997

Marvin Thomason *mt*
1 Bell Center
Room 4102
St. Louis, MO 63101

Dear Mr. Thomason:

BellSouth has discontinued termination of local traffic from NEXTLINK's Memphis, Tennessee customers to West Memphis, Arkansas, purportedly because NEXTLINK and SouthWestern Bell do not have an interconnection agreement in place.

We disagree that traffic sent to the West Memphis portion of the local calling area via BellSouth requires an additional interconnection agreement between two companies who are not, in fact, physically interconnected. In order to resolve this traffic problem as quickly as possible, I ask that you contact me at (615) 777-7700 at your earliest convenience so that we can arrange a joint conference with BellSouth to discuss appropriate routing and termination of this traffic.

Sincerely



Dana R. Shaffer
Director - Regulatory and Governmental Affairs

D86:rom

105 Malley Street
Suite 300
Nashville, TN 37201
615.777.7777
fax: 615.777.7709

*** TOTAL PAGE.01 ***

January 29, 1997

Mr. Marvin Thomason
Southwestern Bell Telephone Company
One Bell Center
Room 41L1
St. Louis, MO 63101

Dear Mr. Thomason:

BellSouth and Southwestern Bell Telephone Company (SWBT) currently have an agreement which covers local traffic between SWBT's West Memphis, Arkansas exchange and BellSouth's Memphis, Tennessee exchange. Competitive local service providers are also offering service in the Memphis area. In November, 1996, NEXTLINK contacted BellSouth about blocked traffic from their subscribers to the West Memphis, Arkansas exchange, and MCI Metro encountered this situation last week.

In response to the NEXTLINK contact last November, we investigated the situation and subsequently contacted Mr. Bill McBride with SWBT. Based on our investigation and discussions with Mr. McBride, our position is summarized as follows:

1. We understand that SWBT requires an interconnect agreement with other local exchange companies who wish to terminate traffic to SWBT's West Memphis, Arkansas exchange.
2. BellSouth's Memphis network cannot currently support calls between other local exchange companies and the West Memphis, Arkansas exchange. This limitation is inherent in the existing network. Therefore, BellSouth has never terminated NEXTLINK calls to West Memphis, nor has BellSouth taken any specific action to block calls from competing local service providers to West Memphis.
3. Local traffic between SWBT and other local exchange companies can be easily routed through our Memphis network. Once agreements are reached between SWBT and the other parties, BellSouth is ready to implement an appropriate network arrangement to accommodate this traffic.

We informed NEXTLINK on November 20, 1996, and MCI Metro on January 27, 1997, of our position as stated above, and we remain available to work with all parties in resolving this situation.

Any questions regarding this matter may be directed to Paul Stinson at 615-214-3839.

PTS

cc: Dana Shaffer, NEXTLINK
Wally Schmidt, MCI
Bill McBride, SWBT
Charles Howorth, BellSouth

TO: Sue Wallace, Specialist - Network Operations
FROM: Paul Stinson, Manager - Regulatory
SUBJECT: NEXTLINK's Traffic to West Memphis, Arkansas
DATE: March 31, 1997

On March 28, 1997, the Arkansas Public Service Commission approved the interconnection agreement between Southwestern Bell Telephone Company (SWBT) and NEXTLINK. A copy of the approval Order is attached.

Based on this notification, we need to immediately activate translations to pass traffic originating from NEXTLINK's subscribers to SWBT's West Memphis, Arkansas exchange. Please notify me at 214-3839 when these translations have been activated.

PTS

Attachment

Post-It™ brand fax transmittal memo 7671

of pages > 2

To: AUL STINSON	From: MARVIN THOMASON
Dept.	Co.
Phone # 314-331-9700	
Fax # 314-331-9790	

 ARK. PUBLIC SERV. COMM.
 JAR 94-0728
 STORSTANT. F COMM.

 KANSAS
 ICE COMMISSION

MAR 28 12 25 PM '97

FILED

IN THE MATTER OF JOINT APPLICATION
 BY SOUTHWESTERN BELL TELEPHONE
 COMPANY AND NEXTLINK TENNESSEE,
 L.L.C. FOR APPROVAL OF TRAFFIC
 TERMINATION INTERCONNECTION
 AGREEMENT UNDER SECTIONS 251 AND 252
 OF THE TELECOMMUNICATIONS ACT OF
 1996

 DOCKET NO. 97-119-U
 ORDER NO. 2
ORDER

On March 17, 1997, Southwestern Bell Telephone Company (SWBT) and NextLink Tennessee, L.L.C. (NextLink) filed a Joint Application requesting approval of a Traffic Termination Interconnection Agreement (Agreement) between SWBT and NextLink pursuant to the Telecommunications Act of 1996 (1996 Act). According to the Application, the Interconnection Agreement establishes terms for interconnection limited to compensation for terminating interexchange traffic between NextLink's local exchange customers in Memphis, Tennessee and SWBT's customers in West Memphis and Marion, Arkansas exchanges through "Extended Calling Area Traffic."

The 1996 Act requires that any negotiated interconnection agreement shall be submitted to the State commission for approval. The Commission shall approve or reject the agreement within ninety (90) days of the date it is submitted by the parties to the agreement or the agreement is deemed approved. 47 U.S.C. §252(e).

The 1996 Act specifies that the Commission may only reject:

- (A) an agreement (or any portion thereof) adopted by negotiation under subsection (a) if it finds that -
- (i) the agreement (or portion thereof) discriminates against a telecommunications carrier not a party to the agreement; or
 - (ii) the implementation of such agreement or portion not consistent with the public interest, convenience, and necessity; . . . 47 U.S.C. §252(e)(2).

3/28

Mr. Tolson	COPIES
Mr. Ladd	
Mr. Nichols	
Mr. Belmont	
Mr. Mohr	
Mr. Casper	
Mr. Callahan	
Mr. Conrad	
Mr. Felt	
Mr. Gale	
Mr. Rosen	
Mr. Sullivan	
Mr. Tavel	
Mr. Trotter	
Mr. Tele. Room	
Mr. Holmes	
Miss Gandy	

DOCKET NO. 97-119-U
Page 2

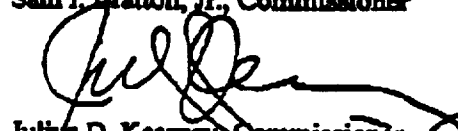
There was no evidence presented in the filed comments that the Interconnection Agreement between SWBT and NextLink discriminates against a telecommunications carrier that is not a party to the agreement or that the agreement is not consistent with the public interest. The Agreement between NextLink and SWBT is a negotiated agreement and there is no evidence that the Agreement should be rejected pursuant to 47 U.S.C. §252(e)(2)(A). Therefore, the Interconnection Agreement filed on March 17, 1997, should be and is hereby approved pursuant to Sec. 252(e) of the 1996 Act, 47 U.S.C. §252(e).

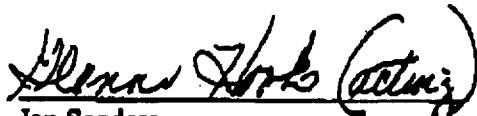
BY ORDER OF THE COMMISSION.

This 28th day of March, 1997.


Lavenski R. Smith, Chairman


Sam I. Bratton, Jr., Commissioner


Julius D. Kearney, Commissioner


Jan Sanders
Secretary of the Commission

BellSouth Telecommunications, Inc.
Room 22A1
333 Commerce Street
Nashville, Tennessee 37201-3300

Regulatory

April 1, 1997

Via Facsimile: (615) 777-7709

Dana B. Shaffer
Director - Regulatory and Governmental Affairs
NEXTLINK
105 Molloy Street, Suite 300
Nashville, TN 37201

Dear Dana:

Southwestern Bell Telephone Company (SWBT) has informed BellSouth that the Arkansas Public Service Commission has approved the interconnection agreement between SWBT and NEXTLINK. Further, SWBT has notified us that they are ready to receive traffic from NEXTLINK in their West Memphis exchange.

BellSouth completed the network translations to route NEXTLINK traffic to the West Memphis, Arkansas exchange on the afternoon of March 31, 1997.

Yours truly,

Paul

July 15, 1997

Ms. Dana Shaffer
NEXTLINK
Director of Regulatory
105 Molloy Street
Suite 300
Nashville, Tennessee 37201

Dear Dana:

Enclosed you will find BellSouth's response to your request for information concerning the June 24, 1997 SS7 outage that NEXTLINK experienced in Nashville, Tennessee. After you have reviewed this information, should you have any additional questions or comments, please feel free to call me at (205) 977-0535 or Donna Hartley at (205) 977-0087.

Sincerely,

William French
Sales Director

Attachment:

cc: Donna Hartley, BellSouth
Paul Stinson, BellSouth

This report will address the SS7 network problem which occurred on June 24, 1997.

NEXTLINK currently obtains SS7 service through GTE INS. On April 7, 1997, NEXTLINK notified BellSouth of plans to connect its Nashville network directly to BellSouth's SS7 network, and a project was created to coordinate this activity. Orders for new SS7 links between NEXTLINK's switch and BellSouth's Nashville Signal Transfer Points (STP) were issued with a due date of June 24, 1997. Although BellSouth's end of these links was ready for testing, NEXTLINK was not able to provide the resources on their end to complete the testing by this due date.

As specified by NEXTLINK, conversion plans kept the same network point code, or network address, for their local Nashville traffic throughout this transition. This approach complicated the project since it would require a "hot cut" with live traffic. Use of a second point code would have permitted complete testing of the new arrangement before committing any live traffic.

On June 24, 1997, NEXTLINK contacted BellSouth at approximately 9:30 a.m. CDT to report a failure in local service interconnection between its network and BellSouth. A BellSouth team joined a conference call with NEXTLINK and their SS7 vendor to identify and correct the problem. The BellSouth participants on that call reported that BellSouth had made no changes in their network to cause this failure.

Subsequent investigation by BellSouth determined that changes were made in BellSouth's Nashville STPs which effectively routed signaling information to the new SS7 links which NEXTLINK had ordered but not completely tested. This action caused the network failure since the links were not ready for use. Network service was restored at approximately 11:00 a.m. In retrospect, there should have been closer coordination with NEXTLINK in testing these links and ensuring that the STP change was not made before NEXTLINK was ready..

BellSouth's investigation found no indication of any action by employees to deliberately disrupt NEXTLINK traffic. That investigation has also determined that the employees participating on the June 24, 1997 conference call were unaware, at the time of the call, of the change which had been made in the Nashville STPs. BellSouth has reviewed existing procedures and determined that they properly address the steps required for a conversion of this type. Further, BellSouth is reviewing these procedures with the appropriate employees to ensure complete understanding of these procedures.

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As specified by NEXTLINK, conversion plans kept the same network point code, or network address, for their local Nashville traffic throughout this transition. This approach complicated the project since it would require a "hot cut" with live traffic. Use of a second point code would have permitted complete testing of the new arrangement before committing any live traffic.

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This report will address the SS7 network problem which occurred on June 24, 1997.

NEXTLINK currently obtains SS7 service through GTE INS. On April 7, 1997, NEXTLINK notified BellSouth of plans to connect its Nashville network directly to BellSouth's SS7 network, and a project was created to coordinate this activity. Orders for new SS7 links between NEXTLINK's switch and BellSouth's Nashville Signal Transfer Points (STP) were issued with a due date of June 24, 1997. Although BellSouth's end of these links was ready for testing, NEXTLINK was not able to provide the resources on their end to complete the testing by this due date.

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July 15, 1997

Ms. Dana Shaffer
NEXTLINK
Director of Regulatory
105 Molloy Street
Suite 300
Nashville, Tennessee 37201

Dear Dana:

Enclosed you will find BellSouth's response to your request for information concerning the May 29, 1997 outage that NEXTLINK experienced in Nashville, Tennessee. After you have reviewed this information, should you have any additional questions or comments, please feel free to call me at (205) 977-0535 or Donna Hartley at (205) 977-0087.

Sincerely,

William French
Sales Director

Attachment:

cc: Donna Hartley, BellSouth
Paul Stinson, BellSouth

NEXTLINK loss of toll service May 29, 1997

On May 29, 1997, BellSouth detected an excessive number of call delivery failures in the Nashville Access Tandem, which provides interconnection to all local competitors and provides toll service to BellSouth customers and several Independent Companies in middle Tennessee. The frequency of these failures reached a level which, if unresolved, could have severely affected switch performance for all customers, including NEXTLINK. Normal escalation procedures within BellSouth were used to investigate these failures, and it was determined that these failures were being caused by the Access Tandem's attempts to process incoming 17-digit toll calls to NEXTLINK. The translations arrangement agreed to between BellSouth and NEXTLINK allowed toll calls with a maximum of 10 digits to be routed on the local trunk group. Immediate action was required to prevent a switch failure. Therefore, all NEXTLINK incoming toll traffic was routed to a toll group between the BellSouth Nashville Access Tandem and NEXTLINK. This toll group had been established for further growth but had not been activated with NEXTLINK. BellSouth personnel who rerouted the traffic did not realize that the toll group was inactive.

Subsequent calls from NEXTLINK to the BellSouth ACAC reported that NEXTLINK was not receiving any incoming toll calls from the Access Tandem. Further investigation indicated that this was due to the inactive toll group described above. BellSouth explained the problem encountered in the Access Tandem with NEXTLINK's incoming toll calls and NEXTLINK made the necessary changes in its network to accept toll calls over the newly activated toll group.

BellSouth had no notification from NEXTLINK of any impending changes to NEXTLINK's incoming toll traffic in Nashville, i.e., some toll calls would exceed 10 digits. The required change in toll traffic routing to handle calls exceeding 10 digits should have been better coordinated by both companies. However, BellSouth should have notified NEXTLINK of changes made. BellSouth's investigation found no indication of any action by BellSouth employees to deliberately disrupt traffic.

BellSouth practices will be modified to ensure that Competing Local Exchange Companies (CLECs) will be contacted when routing changes of this type are necessary. These procedures will be reviewed with all appropriate employees to ensure their understanding.

MESSAGE

Dated: 10/06/97 at 17:39

Subject: September 15, 1997 Outage

Contents: 3

Sender: gbreetz / internet, mime

DDT1=RFC-822; DDV1=gbreetz@nextlink.net;

1

FROM: gbreetz / internet, mime

DDT1=RFC-822; DDV1=gbreetz@nextlink.net;

TO: Donna G. Hartley / AL, BRHM03

Marcus B. Cathey / AL, BRHM06

CC: rland / internet, mime

DDT1=RFC-822; DDV1=rland@nextlink.net;

dshaffer / internet, mime

DDT1=RFC-822; DDV1=dshaffer@nextlink.net;

pscarlett / internet, mime

DDT1=RFC-822; DDV1=pscarlett@nextlink.net;

Part 2

ARPA MESSAGE HEADER

Part 3

Donna, first let me thank you for your letter dated September 29, 1997 regarding the outage we experienced on September 15, 1997. After reading your letter and conversing with our technical staff, I have a few questions and clarifications which I would like to get cleared up and make you aware of.

If the NPA split occurred around 6:00 PM on Friday, the 12th of September, why did no blockage occur until Monday afternoon the 15th? It would seem that if the split was the source of the problem, the errors would have begun occurring immediately. Our records indicate that we were not experiencing any problems from Friday afternoon until around 2:00 PM on Monday. This would seem to indicate that something else occurred around 2:00 that caused this problem.

I suspect that this kind of error would have caused SWERRs, since this is what happened the last time we experienced this problem. If so, we would like to have copies of these to validate your information against the information from our switch. Given that BellSouth regularly is involved in the planning and implementation of NPA splits, it is very disappointing to learn that this one went so poorly. Your letter indicates that 15 nxx codes were omitted from the FNPA table.

I am curious and concerned as to why your system of internal controls would not be strong enough to assure that zero errors occurred. These 15 errors represent roughly 10% of the total number of nxx's that were changed to the 931 area code. Surely a 10% error margin does not fall within anyone's range of acceptability.

You pointed out that BellSouth did mail a general notice to NEXTLINK about the changing of the NPA. However, no where in your letter did you state that translations would be effected, nor, that as a carrier, we should be concerned about testing the impact of the FNPA. Accordingly, we believe the notice we received from BellSouth was unacceptable.

If this problem could have effected any provider of service, who else reported this problem besides NEXTLINK? Did BellSouth experience any of these same problems? If so, why didn't BellSouth discover the problem before NEXTLINK did?

We initiated conversations with BellSouth on Tuesday September 9th concerning the upcoming change to the 615 area code. Also during the conversations we tested both seven and ten digit outgoing dialing patterns. During that phone call we were told that no testing was necessary on incoming calls to us because BellSouth had the issues under control. Obviously, this was not the case.

Donna, given these issues mentioned above, I am asking that BellSouth re-review the facts surrounding this outage to make absolutely sure the information you provided in your letter are 100% factual. As you will recall, when we had the SS7 outage, certain BellSouth personnel made claims that later proved to be untrue.

I look forward to hearing back from you, and if you have any questions please feel free to call me at 615-777-7742.

"

MESSAGE

Dated: 09/24/97 at 08:42

Subject: Outage of September 15, 1997

Contents: 3

Sender: gbreetz / internet, mime

DDT1=RFC-822; DDV1=gbreetz@nextlink.net;

1

FROM: gbreetz / internet, mime

DDT1=RFC-822; DDV1=gbreetz@nextlink.net;

TO: Donna G. Hartley / AL, BRHM03

Part 2

ARPA MESSAGE HEADER

Part 3

Donna, I need the email addresses of the others I want to send the following letter to:

As you are now aware, NEXTLINK experienced yet another outage on September 15, 1997 which was caused by changes made within the BellSouth network. This particular outage is the most disturbing outage to date for a variety of reasons.

1. We were told during the NEXTLINK/BellSouth meeting at the BellSouth building in Nashville on August 15th, that BellSouth had taken the appropriate steps and measures to assure that our trunks would be given the attention they deserve and that BellSouth personnel would not make changes to those groups without planning the change with us and then making the change during non-business hours.

2. When our account team arrived for our meeting in Memphis of September 16, 1997, they had no knowledge of the outage. I am at a loss as to how the entire account team could be "in the dark".

Donna, how will BellSouth ever argue that effective competition exists in Tennessee when, as a Company, BellSouth can, without notice, or reason, disrupt incoming and/or outgoing calls into and out of our network. Especially in light of the promises that such events would not be repeated after the first time.

I am also concerned that BellSouth does not have adequate escalation procedures in place to keep an account team informed. It seems to me that your ability to service our account is greatly diminished when you are not provided with information when BellSouth disrupts service to your customer.

We are anxiously awaiting a written response as to the cause of this problem. Additionally, we need to start some dialog about our ability to charge BellSouth a financial penalty when these events happen.



BellSouth Interconnection
Room South E4E1
3535 Colonnade Parkway
Birmingham, Alabama 35243

September 29, 1997

Greg Breetz
NEXTLINK
105 Molloy Street, Suite 300
Nashville, TN 37201

Dear Mr. Breetz:

This is in response to your request for an investigation and report of the details concerning the outage on September 15, 1997 for NEXTLINK's customers. Attached are the results of that investigation.

As your business partner, BellSouth is making every effort to improve delivery of services to end users.

I am available to discuss this with you at your convenience. Please call me at (205) 977-0087 or e-mail me at Donna.Hartley2@bridge.bellsouth.com. Thank you.

Sincerely,

Donna Hartley
Regional Account Manager

Attachment

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POST MORTEM FOR NEXTLINK TRUNKING TRAFFIC DISRUPTION

CHRONOLOGY

On Friday, September 12, 1997 the planned split of the 615/931 NPA's was accomplished by BellSouth at approximately 6:00 p.m. On Monday, September 15, 1997 at about 2:00 p.m. some incoming toll traffic experienced blocking. This traffic involved several interexchange carriers and local exchange carriers in Middle Tennessee. It appears that any customer, including BellSouth customers, making interLATA toll calls to an affected local exchange company could have experienced this blocking. This blocking condition lasted for approximately thirty-five minutes.

ROOT CAUSE ANALYSIS

The 615/931 NPA split required BellSouth to add a Foreign NPA (FNPA) Control table to the Nashville Access Tandem in order to properly route incoming toll calls to offices in either NPA. This table was not required prior to the NPA split since only one NPA existed in the Nashville LATA. The service disruption was caused by the omission of 15 NNX codes in the FNPA Control table. This omission included two of NEXTLINK's five codes and other codes assigned to another telephone company operating in Middle Tennessee. When the Access Tandem attempted to process some incoming toll calls to the NEXTLINK codes missing from the FNPA Control table, the call processing defaulted to an arrangement which routed these calls to a one-way trunk group from BellSouth to NEXTLINK. Had these codes been included in the FNPA Control table, these calls would have been routed correctly.

At approximately 2:00 p.m. on September 15, 1997, NEXTLINK contacted the Network Infrastructure Service Center (NISC) to report the incorrectly routed traffic. NISC personnel immediately started an investigation, corrected the missing NEXTLINK NNX codes and proceeded to look for other codes which were missing from the FNPA Control table. The problem was corrected by approximately 2:35 p.m. The NISC also requested that NEXTLINK contact the ACAC and initiate a trouble ticket on this problem.

CORRECTIVE ACTION

Once service was restored the NISC took the additional step of adding a Class of Service Screen in the switch specifically for CLEC traffic. This screen should prevent any default arrangement from changing the routing on CLEC traffic and will provide additional notice to NISC personnel when accessing translations on CLEC trunks. BellSouth has added this screen to all CLEC trunking in Tennessee.

CONCLUSION

BellSouth completed the scheduled split of the 615/931 NPA's on September 15, 1997 as scheduled. The omission of some NNX information in a database affected some incoming toll traffic to other local exchange carriers in Middle Tennessee. When notified of this service disruption the Network Infrastructure Service Center immediately initiated an investigation and corrected the problem within approximately thirty-five minutes. To prevent a reoccurrence of this situation, BellSouth added a Class of Service Screen which overrides all attempts to change the routing on CLEC traffic without hands-on intervention. This feature was added statewide for all CLECs.